

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SPECIALTY NATIONAL INSURANCE COMPANY,

Plaintiff,

-against-

ENGLISH BROTHERS FUNERAL HOME,

Defendant.
-----X

Civil Action No.:
07-CV--07507 (SHS)

**NOTICE OF MOTION
FOR SUMMARY
JUDGMENT**

PLEASE TAKE NOTICE that pursuant to the order of the Honorable Sidney H. Stein entered on April 25, 2008, directing plaintiff Specialty National Insurance Company ("Specialty") to serve and file the motion herein on or before May 9, 2008, the Local Civil Rule 56.1 Statement of Undisputed Facts with exhibits annexed thereto and the accompanying memorandum of law, Specialty will move this Court at a time and date to be determined once the motion has been fully briefed, at the United States Courthouse located at 500 Pearl Street, New York, New York 10007, for an order (i) granting Specialty's motion for summary judgment pursuant to FRCP 56 in its entirety, and declaring that Specialty has no duty to defend or indemnify the defendant English Brothers Funeral Home ("English Brothers") with regard to numerous lawsuits alleging intentional and fraudulent acts arising from the illegal harvesting of body parts from corpses and (ii) granting such other and further relief as this Court deems just and proper.

Dated: New York, New York
May 8, 2008

Respectfully submitted,

By: 

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-and-

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